



Assessing Our Results

This chapter addresses the final element of EPA's planning, budgeting, analysis, and accountability process: our approach to evaluating and reporting progress towards goals and objectives. The accountability process will support Agency managers, the Administration, Congress, and the public in assessing our results and making informed decisions about the direction of the Agency's work.

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An effective accountability process not only provides feedback on the success of specific programs, but also introduces a higher level of integrity into planning and budgeting by holding managers responsible for performance. By analyzing actual performance and costs, the Agency can make better estimates so that planning and budgeting become more accurate and reliable. Using a business analogy, the accountability process provides a way for decision makers to determine return on public investments and weigh investment options.

The accountability process will involve annual program performance reports, longer-term assessments of progress towards strategic objectives, and program evaluations. Annual reports will track whether activities and short-term accomplishments take place as planned, documenting financial investments and results data in one report. The annual performance goals in the annual report specify how our longer-term objectives are expressed in the day-to-day activities of our programs. Annual performance goals are expressed in terms that allow comparisons between planned and actual performance. Over time, we will assess how much cleaner the air, water, and land are becoming, and how much risks to human health and ecosystems are being reduced. Program evaluations will provide a detailed examination of relationships between activities and results for a given program. This will help EPA to document strategies that have worked well or, if timely progress is not being made, to analyze what is not occurring as expected and decide how we may need to change strategies.

What Will Be Accomplished

EPA will implement a prototype of an integrated planning, budgeting, analysis, and accountability system in FY 1999. The Agency will produce its initial performance report in March 2000.

Strategies for Meeting the Above Accomplishment

- *We will work with internal and external stakeholders to design the accountability system.*
- *The design will identify/incorporate linkages to other Agency accountability efforts.*
- *We will rely, as much as possible, on existing sources of environmental data and determine whether the data are adequate to evaluate program effectiveness.*
- *In evaluating programs, we will explore ways to incorporate risk reduction and consideration of costs into setting Agency priorities.*
- *We will continuously foster development of outcome oriented performance measures.*
- *EPA will include external assessments of Agency efforts to better inform our self-evaluations.*



Performance Measures

The key to EPA's accountability system will be developing sound performance measures: results or activities we will track to determine whether we are making timely progress towards our objectives. The objectives vary in the types of outcomes they address. Most focus on environmental results, but some address activities and services, such as improving cost effectiveness and customer focus in providing assistance or information to the public, states, tribes, and local governments. A critical step will be to develop practical performance measures for all our strategic objectives.

There will be trade-offs in selecting the most cost-effective measures; for example, in obtaining accurate information on environmental results while avoiding unreasonable reporting burdens for states or regulated entities. In recent years, we have invested in better systems for collecting and analyzing environmental data, and more work is planned to provide the data needed to assess performance as required by GPRA.

Need for Performance Measures Along Continuum from Activities to Results

EPA and its partners will need various types of measures, ranging from tabulations of annual activities to reports on environmental quality and health and ecological effects. Environmental performance measures are often described as being arrayed along a “continuum,” from activity measures at one extreme to ultimate health and ecological effects at the other. The less expensive measures typically are activity measures and less direct

environmental indicators. The most direct indicators reveal more about environmental results, but can be expensive and technically difficult to collect.

Terminology for Performance Measures

Measures of actions taken by EPA are referred to here as “activity measures,” which correspond to “output” measures as defined in GPRA. Actions taken by others in response to EPA's activities are one type of “outcome” as defined in GPRA, and impacts on environmental quality, human health, and ecosystems are another type of “outcome.” EPA and state environmental agencies distinguish the two: activities of other entities in response to EPA are “program outcomes,” while measures of changes in environmental conditions are “environmental indicators.” Environmental indicators can be further categorized into less direct indicators—air, water, or terrestrial pollutant levels—and more direct indicators, such as human health effects or conditions of plant and animal life.

Developing Better Performance Measures

In general, we will be able to report immediately on the activities accomplished to support our objectives. Initially, we will be unable to report “outcome” measures for all objectives. For some objectives with environmental outcomes, this will require advances in environmental monitoring or data analysis. EPA, the states, other federal agencies, and academia have made significant efforts recently to catalog existing environmental data and fill data gaps to improve the national information base on environmental quality and impacts on health and ecosystems. This is a continuing process, and we will draw on the best measures available at the time.

To meet the obligation under GPRA, EPA is involved in ongoing efforts to develop information necessary to accurately evaluate Agency progress in achieving each of its strategic goals and objectives. The Agency is evaluating information resources relative to information needs and priorities at the national, regional, state, and community levels. Activities in this area include developing descriptive profiles and conducting peer reviewed statistical assessments of twenty-five national environmental databases maintained by EPA; developing an Agency-wide monitoring strategy to link future environmental monitoring with the Agency's strategic goals and objectives; and

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identifying, evaluating and implementing the most promising advanced environmental monitoring and information communication technologies.

Data gaps and data quality issues related to performance measures are being identified to guide federal, state, industry, academic and community investments in improving information. For example, the Executive Steering Committee for Information Resources Management has allocated funds for specific projects targeted at filling data gaps in program offices' abilities to report on "environmental results." Some individual program offices are investing in initiatives to improve collection and availability of environmental data.

EPA and its partners also need to develop further performance measures for objectives that lack direct environmental results. For such objectives, we will develop measures reflecting the important results or outcomes that are to be accomplished. These may address a wide range of factors, such as creating specified, quantifiable products, measures of customer satisfaction, quality of services provided, or timeliness of processes performed for customers, partners and the public.

Through the Agency's Planning, Budgeting, Analysis and Accountability process, the Agency will work with its partners to continuously evaluate the availability and quality of data to track progress in achieving EPA's strategic goals and objectives. The Planning, Budgeting, Analysis and Accountability process will enable the Agency to assess the practicality and feasibility of

collecting environmental data for strategic performance evaluation and make appropriate adjustments in monitoring and reporting strategies and performance goals.

Performance Measures Developed Jointly with the States/Tribes

EPA's national program priorities are reflected in the Headquarters/Regional memoranda of agreement (MOA). The MOAs contain commitments negotiated between headquarters and the regions, thereby establishing the scope of activities to be carried out. The regions, in turn, use the national priorities to align their negotiations with the states. As indicated earlier, state governments have primary responsibility for implementing most environmental programs. While some EPA responsibilities, such as preparing regulations and providing technical support, require work not directly linked to state activities, our success in meeting our objectives will depend largely on programs carried out by the states, tribes, and other partners in environmental protection.

To provide a common basis for tracking progress and establishing commitments between the states and EPA, the Agency joined forces with the Environmental Council of the States (ECOS) to establish the National Environmental Performance Partnership System (NEPPS). Under this system, EPA and the states negotiate overall goals and objectives to include identifying "core performance measures." These agreements will communicate the primary activity outputs, programmatic outcomes, and environmental outcomes expected from work under authorities delegated to the states by EPA. In addition, other state organizations will work with EPA to develop performance measures. Over time, as some environmental data become more widely available, EPA will continue efforts to decrease reporting on activities, and to increase the focus on environmental results. We expect "core measures" to be included in most state/EPA work plans and related agreements, unless special circumstances dictate otherwise. The Agency is also working to enhance partnerships with the tribes to address specific environmental and human health goals, objectives, and performance measures.

Reviews of Progress Towards Strategic Goals and Objectives

Annual Performance Reports

To support the accountability process, a variety of reports will provide performance and cost information to Agency managers, the Office of Management and Budget, Congress, and the public. The first will be the annual performance progress report for FY 1999. EPA will issue this initial report no later than March 31, 2000. It will document performance accomplishments compared to annual "performance goals" established in the Annual Performance Plan. The annual performance goals will be target levels for key performance measures that represent progress towards each strategic objective, resulting from investments made in FY 1999. The report will identify any cases where annual performance goals have not been met and explain the reasons why they have not been met. For example, performance goals may not have been reached due to unforeseen external events, or because incorrect assumptions were made about the effort needed for some tasks. The report will discuss any corrections or changes in approach needed to address failures to meet annual performance goals, and describe any actions already taken by EPA to get back on track.

Beginning with the FY 2000 annual report, all annual reports will include retrospective descriptions of performance results from previous years, until the FY 2002 and subsequent reports, which will present data for the three previous years.

Program Evaluation

In addition to annual performance reports, EPA will prepare periodic reports of progress towards our strategic goals and objectives. Since many of the strategic objectives set forth targets for measurable environmental results, we will analyze data and report on environmental status and trends. This will include trends in pollutant emissions. For the most part, the Agency will emphasize true environmental indicators: the amounts of air, water, and land sites in conditions that meet applicable environmental quality standards. When possible, we will also report the degrees to which human health or ecological conditions are being protected. In some cases, Agency Inspector General, General Accounting Office and management integrity findings will be considered in assessing program performance.

The reports of progress towards strategic objectives will show whether we are achieving intended results. For some programs, we will conduct intensive program evaluations to analyze relationships between activities being conducted and environmental results. Criteria for selecting programs to evaluate will include the importance of the environmental issues being addressed, and whether programs are on schedule to meet their objectives. If timely progress is being made, the evaluations will help show what is working and why. If not, we will examine the relationships among EPA, states, regulated entities, and others, and the changes in pollution emissions, other stresses, and ultimate environmental impacts of these stresses to determine why. Studies of cause and effect can be complex, and answers may not always be found. Detailed analyses may help us develop more effective approaches to reducing environmental impacts. In other cases, these analyses may result in new research to determine why assumptions about relationships between stresses and impacts did not prove accurate when pollution reduction or cleanup activities were put into practice, and to develop better approaches for the future.

Evaluations will look at different ways to meet objectives.

This will include:

- 1) examining the effectiveness of program actions and need for mid-course corrections;
- 2) assessing appropriateness of the environmental indicators used and determining whether advances in science have made better ones available;
- 3) identifying factors beyond our control that affect performance; and
- 4) determining whether target levels and times stated in the objective are reasonable.

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The results of program evaluations will influence annual performance plans for subsequent years. If performance goals need revision, new or modified performance goals will be designed and incorporated into the relevant annual plans, with associated modifications to performance measures as needed.

Integrating the Accountability System with Cost Accounting Standards

Two key activities in building a strong accountability system will be changes in how EPA structures its budget and the adoption of the recently issued Federal Accounting Standards Advisory Board's (FASAB's) cost accounting standard. To integrate management processes more fully, EPA will work closely with the Office of Management and Budget and Congress to develop a budget structure that parallels the goals and objectives identified in this strategic plan. This link between performance measures and resources will serve as the basis for annual performance reporting.

To comply with the FASAB standard, EPA's Chief Financial Officer will ensure that cost accounting is implemented to support EPA program managers and the public by producing information that is timely, useful, and accurate, and related directly to planning, accountability, and decision making. Cost information will be coordinated with the new planning and budgeting structure, and cost information will be integrated into accountability reports.

Internalizing GPRA Requirements within the Agency

Accountability for achieving results needs to permeate the organizational fabric of EPA, from top management to each staff employee. Management will aggressively communicate EPA's goals and objectives throughout the Agency to ensure that employees clearly recognize how they contribute to the Agency mission. Of equal importance, employees also will be held accountable for program results. To accomplish these ends, EPA will create direct linkages between its human resource activities and the achievement of the objectives in the Agency's Strategic Plan. For example, performance, awards, and recognition programs need to provide incentives to employees and reward groups and individuals who are having a discernible impact on the goals and objectives in the plan.

As the Agency continues to automate, streamline, and reengineer its procedures, the knowledge, skills, and abilities required by EPA employees to perform the Agency's work will change. Specialized recruitment and training, as well as process retooling, may be necessary in order to build and sustain a workforce capable of achieving the results envisioned in EPA's goals and objectives.

Coordination with Other Reporting Responsibilities

Where appropriate, EPA will integrate GPRA reporting with other reporting requirements. These include reports relating to financial management and fiscal integrity responsibilities, as well as other public information activities for financial, management, and accountability. EPA will provide comprehensive assessments of our financial investments and adherence to financial and management standards, when combined with reports of environmental outcomes accomplished.

Financial and Management Reporting

To the extent possible, EPA will integrate annual performance reports with financial accountability reporting, including requirements of the Chief Financial Officers Act, the Government Management Reform Act (GMRA), the Federal Managers Financial Integrity Act, the Federal Financial Management Improvement Act, the Inspector General Act, the Prompt Payment Act, and the Debt Collection Act, as well as the report on Civil Monetary Penalties. The goal will be to link performance and cost information more closely to provide the public and Congress with a snapshot of Agency operations. The final format for the combined reporting will be based on recommendations currently being developed by the Chief Financial Officers Council.

State of Environment Reports and Electronic Data Access

In addition to GPRA reports documenting the environmental outcomes of our programs, EPA will continue to provide the public with reports and electronic databases concerning the overall state of the environment. A number of such reports are produced by EPA under the Clean Air Act, Clean Water Act, and other legislation. In

recognition of the important responsibility to support public access to comprehensive environmental information, EPA has recently established a Center for Environmental Information and Statistics (CEIS).

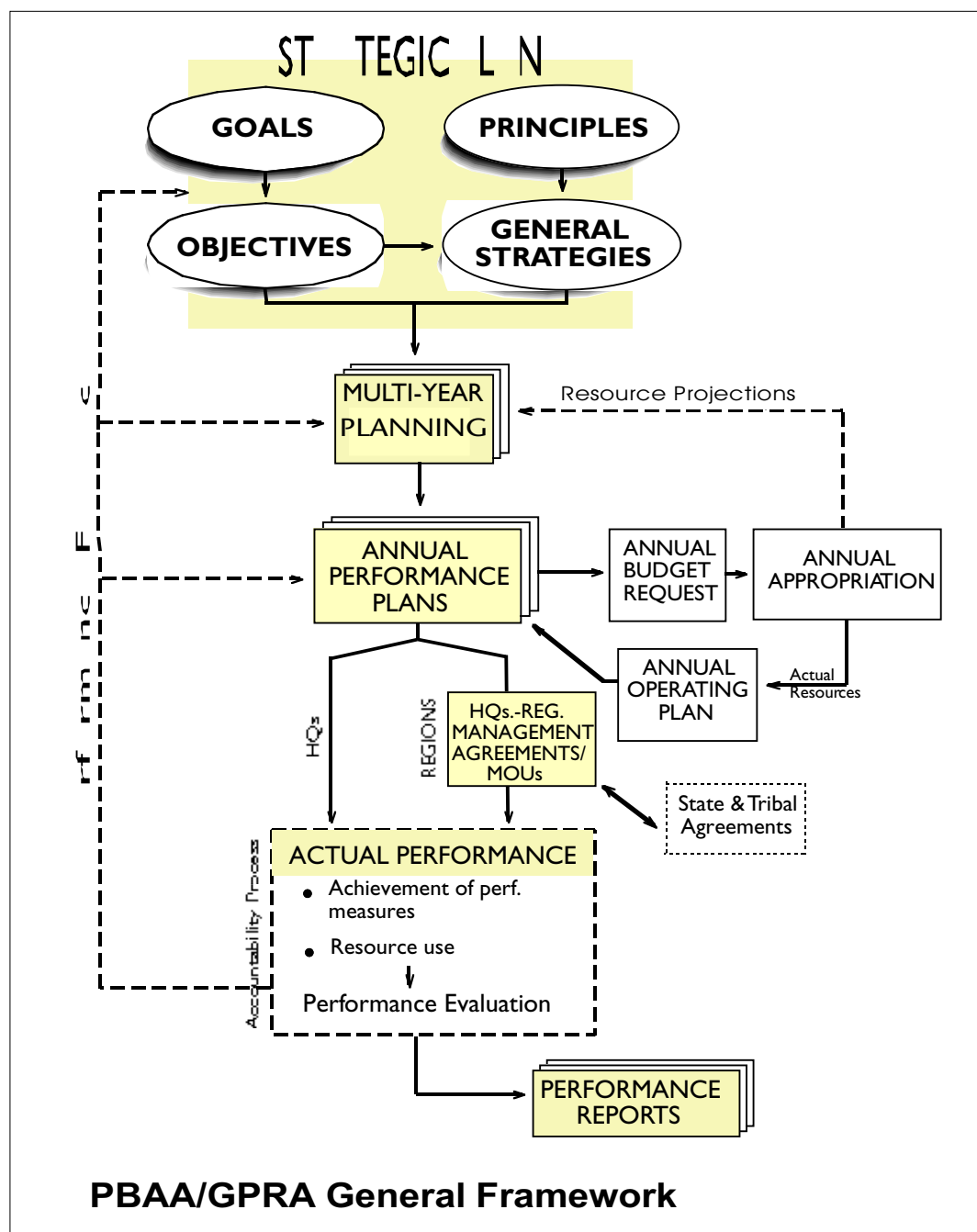
CEIS plans to produce periodic State of Environment Reports as well as enhance electronic public access to EPA's data. Environmental databases are maintained for a variety of purposes throughout EPA. These functions will not be taken over by CEIS, nor will they be integrated into a single reporting system. However, under the accountability process, EPA will ensure that members of the public seeking access to EPA data will obtain it in formats readily interpreted by general users.



Appendix A: How the Strategic Plan Connects to Other Agency Documents

EPA's new Planning, Budgeting, Analysis and Accountability process is composed of several steps that are linked in the following way:

Step (1) The Strategic Plan—This plan states EPA's mission. It lays out: (1) long term environmental goals; (2) a set of guiding principles providing a common set of considerations that will be used in making decisions; (3) specific shorter-term objectives the Agency will meet in achieving the goals. As required under GPRA, EPA will update this plan every three years.



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Step (2) Multi-Year Planning--EPA's programs will conduct multi-year planning efforts based on the Strategic Plan goals. This planning step will describe how each national program will link its annual activities and short-term outcomes to the attainment of our long-term environmental goals.

Step (3) Annual Performance Plans and Budget Request—Annual performance plans will be prepared for each objective and serve as the basis for budget decisions. Annual Performance Plans will describe annual performance goals, measures of outputs and outcomes and the activities aimed for achieving these goals. Based on the Annual Performance Plans, EPA will develop an annual budget request for all Agency programs. Once Congress approves a final appropriation for the year, the annual plans will be revised and the resources allocated accordingly.

Step (4) Performance Evaluation and Reports—Performance Evaluation Reports, required by GPRA six months after the end of the fiscal year, will assess the progress EPA has made toward achieving its goals and will report on the Agency's success in accomplishing its annual performance goals.

Fully achieving the goals of the PBAA approach will take a long-term commitment from EPA. All Agency managers will be integrally involved in setting priorities, making yearly investment decisions and ensuring that program goals that reflect our customer's needs will be achieved. With the development of this Strategic Plan, EPA has a framework for use in the future, thus making the EPA effective in meeting the needs of the American people.

Appendix B: Congressional Consultation and External Stakeholder Input into the EPA Strategic Plan

The Government Performance and Results Act (GPRA) requires federal agencies to consult with Congress and to solicit and consider the views and suggestions of those entities potentially affected by or interested in such a plan.

With respect to the Congress, EPA held briefings in February 1997 for Members of the House and Senate, their staffs, and Committee staffs on the Agency's framework and process for developing the Strategic Plan. Meetings were held in April and June to discuss specific areas of Congressional interest. Drafts of EPA's mission statement, goals, and objectives were provided in April and May, and a draft Strategic Plan was provided on July 1, 1997. The Agency participated in consultation meetings with Congressional staff on the Strategic Plan in July, August, and September. EPA provided written material to the following Members and participated in meetings with Congressional staff as indicated below.

House of Representatives

Honorable Thomas J. Bliley, Jr.
 Honorable George E. Brown
 Honorable Dan Burton
 Honorable John D. Dingell
 Honorable Robert Livingston
 Honorable George Miller
 Honorable James L. Oberstar
 Honorable David Obey
 Honorable F. James Sensenbrenner, Jr.
 Honorable Bud Shuster
 Honorable Henry A. Waxman
 Honorable Don Young

Senate

Honorable Max Baucus
 Honorable Robert C. Byrd
 Honorable John H. Chafee
 Honorable John Glenn
 Honorable James M. Inhofe
 Honorable Ted Stevens
 Honorable Fred Thompson

Committee Staff

House of Representatives

Appropriations
 Commerce
 Government Reform and Oversight
 Resources
 Science
 Transportation and Infrastructure

Senate

Appropriations
 Budget
 Environment and Public Works
 Governmental Affairs



EPA also conducted a broad outreach program that sought the views and perspectives of its constituencies. EPA provided a series of strategic plan development documents, as well as the draft Strategic Plan to the following organizations for review and comment, and held discussions with many organizations [indicated with a D]. In addition to the stakeholders listed below, the Agency's National Program Managers (NPMs) and Regional Offices have also worked to secure involvement from their specific constituents (e.g., states, tribes, other organizations).

BUSINESS, INDUSTRY, & PUBLIC POLICY ORGANIZATIONS

Business Roundtable [D]
 Friday Forum [D]
 National Advisory Council for Environmental Policy & Technology (NACEPT) Reinvention Criteria Committee [D]
 Corporate Environmental Enforcement Council (CEEC) [D]
 Enterprise for the Environment (E4E) [D]
 Coalition for Effective Environmental Information (CEEI) [D]

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National Academy of Public Administration (NAPA)
 US Chamber of Commerce
 National Federation of Independent Business
 Chemical Manufacturers Association [D]

ENVIRONMENTAL AND PUBLIC INTEREST GROUPS *

Environmental Defense Fund [D]	National Audubon Society
Greenpeace	National Fish and Wildlife Council
Sierra Club	Children's Defense Fund
National Resources Council of America	Natural Resources Defense Council [D]
Resources for the Future	Sierra Club Legal Defense Fund
American Oceans Campaign	Union of Concerned Scientists
US Public Interest Research Group	American Rivers
World Resources Institute	Center for International Environmental Law
World Wildlife Fund	Center for Marine Conservation [D]
Nature Conservancy	OMB Watch [D]
Clean Water Action	Trout Unlimited
Clean Water Network	Ducks Unlimited
Environmental Information Center	Wildlife Habitat Council
Environmental Working Group	River Network
Friends of the Earth	American Public Health Association [D]
American Lung Association	American Farmland Trust [D]
Environmental Law Institute [D]	National Wildlife Federation

* All were invited to participate in discussions with EPA on the draft Strategic Plan

STATE & LOCAL GOVERNMENTS

Environmental Council of the States (ECOS) [D]
 National Association of State Departments of Agriculture
 Association of State and Territorial Health Officials
 Local Government Advisory Committee [D]

TRIBAL GOVERNMENTS

EPA Tribal Operations Committee (includes representatives from 19 Tribal Governments) [D]

OTHER FEDERAL AGENCIES

In addition to the departmental level, in some cases information was also provided to and received from agency and bureau levels of the department)

Department of Agriculture	Consumer Product Safety Commission
Department of Commerce	Federal Emergency Management Agency
Department of the Interior	National Aeronautics and Space Administration
Department of Health and Human Services	Nuclear Regulatory Commission
Department of Energy	National Science Foundation
Department of Justice	National Oceanic and Atmospheric Administration
Department of Transportation	Food and Drug Administration
Department of the Treasury	Bureau of Land Management

Department of Labor
 Department of Defense
 Department of State
 Department of Housing and Urban Development
 Army Corps of Engineers
 Small Business Administration
 Office of Science and Technology Policy
 General Services Administration

Fish and Wildlife Service
 US. Geological Survey
 Occupational Safety and Health Administration
 General Services Administration
 Federal Energy Regulatory Commission
 Tennessee Valley Authority
 U.S. Information Agency
 U.S. AID
 Office of the U.S. Trade Representative

APPROACH TO INTERAGENCY COORDINATION

As part of the process for developing this Strategic Plan, the Agency initiated steps to begin to work closely with those Federal agencies with whom EPA shares responsibility for setting standards and managing programs to improve human health and the environment.

Although time restricted efforts to explore the full range of issues with other Federal agencies during the development stage of this Strategic Plan, the actions taken will help to establish long-term efforts to address any inconsistencies, conflicts or redundancies among Federal programs as identified both in future Strategic Plans and annual performance plans.

The steps to engage other Federal agencies in the development of this Strategic Plan included following the directions outlined by the Chief Financial Officers' Council's GPRA Implementation Committee's Bulletin on Stakeholder Outreach and Interagency Coordination of Strategic Plans. Among EPA actions were:

- issuing a formal request for comment to Federal agencies on goals and milestones for EPA's National Environmental Goals Project. Many Federal agencies participated in the development of these goals, which served as a starting point for EPA's strategic planning efforts;
- reviewing 9 other agency and several bureau-level interim strategic plans for possible conflicts or overlaps with EPA's plan. While few issues required immediate resolution due to the general nature of the language in the strategic plans, this review will serve as a starting point for dialogue with other Federal agencies for the joint development of performance measures and resolution of program management issues;
- soliciting comments from other Federal agencies on EPA's preliminary plan outline, goals and objectives (May 22, 1997) and subsequently the full Agency draft Strategic Plan (July 1, 1997). Input received from other agencies has been incorporated into this plan;
- sharing information and working with several interagency groups on GPRA-related issues. These groups include the Research and Development Roundtable, the Natural Resources Performance Management Forum and the Interagency Regulatory Reinvention Forum; and
- reviewing the final drafts of 21 Federal agency plans in conjunction with the OMB clearance process.

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CROSS-CUTTING AREAS BETWEEN EPA AND OTHER FEDERAL AGENCIES

The chart below identifies, by EPA goal, which areas of our plan require greater integration and review with other Federal agency efforts.

Department/Agency	GOAL									
	1	2	3	4	5	6	7	8	9	10
Agriculture										
Army Corps of Engineers										
Commerce										
Consumer Product Safety Commission										
Defense										
Energy										
Federal Energy Regulatory Commission										
FEMA										
General Services Administration										
Health & Human Services										
Interior										
Justice										
Labor										
NASA										
National Science Foundation										
Nuclear Regulatory Commission										
OSTP										
SBA										
State										
Transportation										
Treasury--International										
TVA										
USAID										
USIA										
USTR										

Goal 1: Clean Air

Goal 2: Clean and Safe Water

Goal 3: Safe Food

Goal 4: Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems

Goal 5: Better Waste Management, Restoration of Contaminated Waste Sites, and Emergency Response

Goal 6: Reduction of Global and Cross-Border Environmental Risks

Goal 7: Expansion of Americans' Right to Know About Their Environment

Goal 8: Sound Science, Improved Understanding of Environmental Risk, and Greater Innovation to Address Environmental Problems

Goal 9: A Credible Deterrent to Pollution and Greater Compliance with the Law

Goal 10: Effective Management

SUMMARY OF KEY COMMENTS ON STRATEGIC PLAN

The Agency received over 800 comments on the draft Strategic Plan in writing and orally during discussions with stakeholders and Congress. Key comments are listed below.

<i>Comment</i>	<i>Response</i>
1. Objectives should be quantifiable.	1. The Agency agrees. In many cases the subobjectives, which are a level of detail below the objective, are where the measurable target is stated. Further, the performance goals in the Annual Performance Plan will contain quantifiable targets. However, for many of the objectives, EPA recognizes that it will take time to develop accurate target estimates (i.e., in some cases EPA needs to first establish a performance baseline). EPA will continue to work on this issue as the Agency develops its Annual Performance Plan and updates the Strategic Plan.
2. The structure of the Strategic Plan should be simplified. The number of elements in the current plan are confusing.	2. EPA will work to improve the clarity of the plan. However, EPA feels strongly that the elements in the plan provide important information related to the Agency's values and commitments. For example, the principles represent important guidance to be used by Agency managers as they make decisions and the cross-cutting program areas are important programs that transcend many of the goals and do not fit neatly into a single goal.
3. Distinguish between goals and objectives that are mandatory & those which are discretionary.	3. In compliance with GPRA, EPA has set numerical targets for a significant number of specific objectives in this Strategic Plan, consistent with EPA's statutory authority to protect human health and the environment and to administer environmental, human health, and other programs. In establishing numerical targets, EPA considered its statutory mandates and authorities and used the best available scientific and technical information. The Strategic Plan also notes specific statutory authorities for each objective.
4. Goals should be an expression of environmental outcomes, and organizational/programmatic efforts should be classified as implementation tools.	4. While EPA agrees that the plan could be structured as the comment suggests, the Agency has decided to keep the current structure at this time for several reasons. These include: 1) many of the activities in the "tools" goals (sound science, pollution prevention, enforcement and compliance, and effective management) are cross-media in nature and, while contributing to the overall mission of the Agency, cannot be

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5. The Plan should prioritize among goals and objectives.

6. EPA should commit to a strategy that uses risk assessment to prioritize environmental risk management decisions.

7. The plan should identify a strategy for increasing and improving the quality of information relating to environmental outcomes.

8. The Plan should contain measurements of off-budget costs. Efficiency should be a stand-alone goal.

9. Cross-cutting programs should be directly related to strategic goals and objectives.

broken down into specific media goals; 2) the “tools” goals are important “goals” in and of themselves for EPA and need to be highlighted; and 3) the Agency believes that retaining these goals is responsive to the spirit of GPRA.

5. EPA agrees that the Plan should provide the vision and direction that the Agency plans to take over the next five years. The Agency does prioritize its activities in the annual planning and budgeting process as it redirects emphasis and resources into high priority areas. As to setting priorities among the goals, the current enabling statutes under which the Agency operates do not lend themselves to flexibility in setting priorities among the environmental goals.

6. The Agency currently uses risk assessment, as well as other factors, to make risk management decisions. In Goal 8--Sound Science--EPA commits to providing improved risk assessment capabilities. EPA intends to use risk assessment, along with other criteria, for making decisions in the annual planning and budgeting process.

7. The Agency is involved in an ongoing process to identify and develop the information needed to accurately evaluate Agency progress in achieving each of its goals and objectives. Because monitoring programs and data collection are expensive and can potentially impact our partners and stakeholders, the Agency is identifying and evaluating current sources of information that can be used to measure performance. EPA will use this analysis of the data as a basis for program investments in information collection and analysis. A brief discussion of this issue has been included in the Strategic Plan.

8. EPA has included a section in the Plan on the “Benefits and Costs of EPA’s Activities” to address this issue. The Agency believes that section provides the best information available at this time. EPA disagrees with the recommendation to establish a “stand-alone goal regarding efficiency,” because it is a principle that is inherent in all of our goals.

9. The cross-cutting program areas transcend many of the goals and do not fit neatly into a single goal. The Agency has clarified the relationship of these programs to the goals in the Strategic Plan.

10. The current Plan does not include a description of how the performance goals of the Annual Performance Plans will be related to the general strategic goals and objectives.

11. EPA should include performance measures relating to its efforts to work with States to achieve environmental goals.

12. The Plan should include a discussion of the responsibilities of the Regions in achieving the goals and objectives.

13. EPA's plan should integrate the environmental objectives of the National Environmental Goals and the National Environmental Performance Partnership System (NEPPS) to make a uniform set of environmental objective.

14. EPA's Plan should explain how it is to be integrated with related policy areas (e.g., transportation, energy, agriculture).

15. The Plan should include strategies for internalizing the Results Act requirements within the Agency.

10. The Strategic Plan has been revised to include a general discussion of the relationship between the annual performance goals and the general strategic goals and objectives.

11. EPA has expanded the discussion of the states' role in implementing environmental programs (see pages 12 and 82-83). In addition, the performance measures relating to state implemented programs are included in the Annual Performance Plan.

12. EPA has included a discussion of the Headquarters/Regional memorandum of agreement (MOA) process which lays out the expectations and responsibilities of the Regions in implementing the programs and activities needed to achieve the goals and objectives (see page 94).

13. EPA's Strategic Plan is largely based on the work done over the last several years on the National Goals project. EPA will continue to work with its state partners to assure that the NEPPS core measures are integrated into the Agency's strategic planning process.

14. EPA is working with other Federal agencies to identify cross-cutting policy areas and programs that need to be integrated with EPA policies and programs. A discussion of this issue is included in the Strategic Plan. In addition, all of EPA's program offices work on a regular basis with other Federal agencies to assure that our activities are consistent with, and integrated into, the related policies and programs of other agencies.

15. The Strategic Plan includes a discussion of this issue and identifies the actions EPA is taking to internalize the requirements of the Results Act.



For additional information, please contact:

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This Plan can also be found at EPA's Internet homepage <<http://www.epa.gov>>.